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November 26, 2019

VIA ECF

Honorable Joseph A. Dickson, U.S.M.J.
U.S. District Court for the District of New Jersey
Martin Luther King Jr. Building & U.S. Courthouse
50 Walnut Street
Newark, New Jersey 07102

Re: *White, et al. v. Samsung Electronics America, Inc., et al.*, No. 17-1775 (MCA)(JAD)
Proposed Consent Order

Dear Judge Dickson:

Gibbons P.C., along with Covington & Burling, represent Defendant Samsung Electronics America, Inc. ("Samsung") in the above-referenced matter. On behalf of all parties in this matter, we submit for Your Honor's consideration, the enclosed Proposed Stipulation and Consent Order Extending Defendants' Time to Respond to Plaintiff's Complaint and Extending the Discovery Stay pending Defendants' motions for reconsideration or to certify for immediate interlocutory appeal, now fully briefed.

If the form of the Proposed Stipulation and Consent Order meets with Your Honor's approval, we ask that it be So Ordered and entered on the docket in this matter.

Thank you for your kind consideration and please do not hesitate to contact me should there be any questions.

Respectfully submitted,

s/ Michael R. McDonald
Michael R. McDonald

Enclosure

cc: All Counsel of Record (via ECF)